

**SUPPORTING STATEMENT FOR  
INFORMATION COLLECTION REQUEST NUMBER 2050-0139  
“REPORTING AND RECORD KEEPING REQUIREMENTS UNDER  
EPA’S WASTEWISE PROGRAM”**

**April 2007**

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## 1. IDENTIFICATION OF THE INFORMATION COLLECTION

### 1(a) Title and Number of the Information Collection Request

Reporting and Record Keeping Requirements under EPA's WasteWise Program," OMB Control No. 2050-0139.

### 1(b) Short Characterization

This submission is intended to satisfy the terms of clearance placed on the 2006 ICR approval. The ICR was approved for one year, provided that WasteWise complete the peer review on its program evaluation methodology (described below), and present the results.

The WasteWise program is an EPA voluntary program that encourages companies, trade associations, non-profit organizations, state/local/tribal/federal governments, schools, colleges, and universities to engage in waste reduction activities. WasteWise focuses on waste reduction—which includes waste prevention, recycling collection, and purchasing or manufacturing recycled-content products. The program was developed and is managed by EPA's Office of Solid Waste (OSW), Municipal and Industrial Solid Waste Division (MISWD). In return for their voluntary participation in the program, WasteWise partners receive:

- A well-developed approach to program design, implementation, and documentation of results that can be implemented within a variety of organizations.
- Recognition opportunities through an annual awards program and being featured on the WasteWise Web site and in WasteWise and other EPA publications.
- Opportunities to network with individuals implementing waste reduction activities in a variety of industry sectors.
- Helpline, account representative, and list server services that assist with the identification of waste reduction opportunities, setting measurable goals, and researching technical questions.
- Access to a library and Web site of technical assistance resources to assist in achieving waste reduction goals.

An organization's decision to participate in WasteWise is completely voluntary. Participation begins with the completion and submission to EPA of a **Partner Registration Form** or **Endorser Registration Form** (the WasteWise Endorser Program will be discussed later in this document) that provides EPA with general organizational information and the facilities committed to WasteWise. It is signed by a senior official that has authority to commit his/her organization to the program.

EPA streamlined the registration and reporting processes as part of its 2004 ICR effort in an attempt to decrease the burden on WasteWise partners. Previously, partners were asked to register, set goals within six months, and then quantify waste reduction results each year. The new structure requires partners to register and designate priorities, and submit one other form, the **Annual Assessment Form** within two months. On this form, partners submit baseline waste reduction data and waste reduction goals. Organizations have broad flexibility in designing their goals, which are now fully incorporated as part of the annual assessment process. EPA not only believes that by having partners submit goals via the annual assessment form, the related work will be less burdensome, but that this new structure will also foster more effective waste reduction activities.

EPA asks new partners to spend time up front in establishing a solid foundation for WasteWise initiatives and allots two months for partners to provide baseline data and goals via the **Annual Assessment Form**. The first year of membership is the only time during which partners are asked to submit baseline data. By having this data to analyze, EPA will be better suited to determine how the program influences its new partners' waste reduction achievements by comparing the baseline data

(measurements from before initiating WasteWise-related efforts) to what the partner accomplishes once part of the program.

Unfortunately, there is not a way for WasteWise to obtain baseline waste reduction data for its existing partners; consequently, EPA developed a means to determine how WasteWise influences its partners' waste reduction efforts. As part of the Agency's continued interest in examining the success of the program, WasteWise developed an econometric methodology that estimates the amount of its partners' waste prevention and recycling achieved, which is attributable to the WasteWise program. This model, which relied on advanced econometric and statistical techniques, attempted to allow EPA to estimate the amount of waste prevention and recycling performed by existing and non-reporting partners, formulate estimations on a material-specific basis allowing EPA to estimate the associated global climate protection benefits, and address concerns regarding the use of different methods by which partners calculate waste prevention and recycling achievements.

As mentioned above, the one-year extension granted to EPA as a result of the 2005 ICR renewal was contingent on a peer review being completed on the econometric method, including the validity of methods to construct baselines. EPA commissioned a peer review of the method and based on the review has ceased implementation of the method. However, EPA is committed to developing a better method for estimating WasteWise's influence on its member's waste reduction activities. EPA has begun to evaluate new methods for measuring the program's impact. A short description of an alternate method is included as Attachment A to this supporting statement.

To account for the program's activities, WasteWise typically asks that its partners report on their waste reduction progress by March 31 of each year. (Established partners are asked to submit goals and waste reduction data on an annual basis.) Previously, partners were asked to submit quantified results for the amount of waste prevented and recycled, the amount of recycled-content products purchased, and/or the increase in recycled materials used in the manufacturing process. In the new, less burdensome structure, partners are asked to submit quantified results via the **Annual Assessment Form** in any of the following areas: the amount of waste prevented and recycled, the amount of recycled-content products purchased (and the percent of recycled content in those products), recycled materials used in manufacturing processes, revenues from waste reduction activities, and avoided costs due to waste reduction activities. Organizations can easily track and record these new categories, which will allow partners (and the Agency) to assess the effectiveness of their efforts.

At this time, EPA also asks partners to submit revised annual goals. In the past, separate from the annual report, EPA asked partners to submit a certain number of goals (which were valid for three years) in specific waste reduction areas. As part of this new, more manageable procedure, EPA asks partners to submit goals on an annual basis—while they are reviewing their annual achievements. Furthermore, to allow for more individualized treatment, partners can set any number of goals for any area of waste reduction (e.g., waste prevention, recycling, buying recycled-content products, and manufacturing recycled-content products).

EPA collects this information in hard copy form or electronically and then enters and stores it in the WasteWise Information Exchange System database (WIES). EPA uses the information collected under the WasteWise program to track the activities of individual organizations participating in the program, recognize partner accomplishments in the three program areas, and identify effective waste reduction strategies to share with others. Recognizing partner achievements is important to help EPA spur other partners on to reduce more waste. Sharing effective waste reduction strategies with others is a fundamental objective of the WasteWise program.

The WasteWise program currently has approximately 1,650 partners. OSW expects WasteWise membership to increase by 100 partners during each year of this ICR. For a new partner joining WasteWise, the information collection activities are estimated on average to cost each organization approximately \$2,480 in the first year and \$2,420 for subsequent years. EPA does, however, expect many

organizations to recognize substantial cost savings, typically more than offsetting the above costs, through the implementation of their waste reduction initiatives reported under WasteWise. (EPA evidence suggests that savings of hundreds of thousands, or even millions, of dollars is not unusual for a large corporation.)

EPA has also continued the additional voluntary component to the WasteWise program, called the WasteWise Endorser Program. Various organizations including trade associations, membership organizations, and federal/state/local governments that become WasteWise endorsers commit to 1) recruiting their members and other constituents to become WasteWise partners and 2) to providing ongoing promotional or technical waste reduction information. Participation in the WasteWise Endorser Program involves the submission of only one form, the **Endorser Registration Form**. This one-page form provides general contact information, the number of business members the organization has, the primary business sectors represented, and the activities that the endorser will conduct. EPA collects this information and enters it into WIES. EPA tracks this information for three main purposes: to establish participation in the program, to understand the activities being undertaken by each endorser, and to identify opportunities to assist them in their efforts (e.g., providing materials or a speaker).

The WasteWise Endorser Program currently has approximately 300 endorsers. EPA expects membership in the WasteWise Endorser Program to increase by 25 endorsers during each year of this ICR. The information collection activities will translate into a one-time cost to each individual organization of approximately \$673 during its first year in the program.

## 2. NEED FOR AND USE OF THE COLLECTION

### 2(a) Need and Authority for the Collection

As stated by Congress (42 U.S.C. #13101-13103. 1990) and EPA (*The Solid Waste Dilemma: An Agenda for Action*. 1989 530-SW-89-019. pp. 16-21), there are significant opportunities for businesses to reduce or prevent pollution at the source through cost-effective changes in production, operation, and raw material use. The Agency has developed a hierarchy asserting that waste should be prevented or reduced at the source whenever feasible; waste that cannot be prevented should be recycled where possible. The Pollution Prevention Act of 1990 directs the EPA Administrator to “facilitate the adoption of source reduction techniques by businesses..., foster the exchange of information regarding source reduction techniques..., and [foster] the provision of technical assistance to businesses (42 U.S.C. #13101-13109. 1990).” Furthermore, the Resource Conservation Challenge, initiated in 2002, urges Americans to increase the United States’ recycling rate to 35 percent. The WasteWise program and associated information collection activities will assist the Agency in meeting the above stated goals by facilitating the prevention and recycling of wastes by participating businesses.

More specifically, EPA needs to collect initial information in the **Partner Registration Form** to formally establish participation in the WasteWise program, to obtain general information on new WasteWise partners, to identify the facilities committed to implementing the WasteWise initiatives, and to gain insight on new partners’ areas of interests/priorities.

EPA also needs to collect the information in the **Annual Assessment Form** to better understand and assist each partner’s waste reduction efforts and progress and to identify effective waste reduction strategies to share with others. Furthermore, as mentioned earlier, by compiling new partners’ baseline waste reduction data, WasteWise will be able to more accurately determine the influence that WasteWise has on its partners’ waste reduction efforts.

For the WasteWise Endorser Program, EPA needs to collect initial information in the **Endorser Registration Form** to establish participation in the Endorser Program and to obtain general contact and membership information, as applicable. EPA also needs to collect the information on recruitment and

ongoing activities to remain apprized of endorser activities to bring new partners into the WasteWise program.

## **2(b) Practical Utility/Users of the Data**

The information collected by the WasteWise program is not designed or intended to support regulatory decision-making by OSW or other EPA offices. These data are voluntarily reported by individual WasteWise partners. The data represent partners' estimates of progress they make towards waste reduction goals, including waste prevention, recycling collection, and buying or manufacturing recycled-content products activities. EPA does not conduct facility audits of WasteWise partners, however, a quality assurance/quality control process is in place to review partner reports for adherence to goals. The data are published for the purpose of sharing information about WasteWise partners' programs and to encourage other organizations to explore and implement waste reduction activities.

Specifically, OSW uses the information collected in the **Partner Registration Form** to update WIES, which contains information on WasteWise participants, initiate contact with the primary person in charge of the member's WasteWise initiatives, and prepare a list of WasteWise partners. The information in WIES is used to track organization status, prepare reports and mailing lists, and determine the focus of future WasteWise outreach materials (based on partners' identified priorities).

OSW uses the information collected in the **Annual Assessment Forms** to record the participant's activities and progress in WIES; identify, develop, and disseminate case studies and other materials on key waste reduction practices (e.g., to be published in the *WasteWise Annual Report* or to be recommended to partners seeking new waste reduction goals); identify areas where additional technical assistance or information would be useful for individual partners or more generally for program participants (e.g., high recycling figures for corrugated paperboard might indicate an opportunity for transport packaging reductions); recognize organizations with significant waste reduction accomplishments at national recognition ceremonies; organize the information in order to prepare and publish a summary report each year; evaluate opportunities for improving the WasteWise program, and measure the program's progress (either based on the baseline data or using the econometric methodology).

OSW uses the general information collected in the **Endorser Registration Form** to update WIES, which contains information on WasteWise endorsers; initiate contact with the primary person in charge of the endorser's WasteWise initiatives; and prepare a list of WasteWise endorsers. The information in WIES is used to track organization status and prepare reports and mailing lists. OSW uses the activity information collected in the form to learn about promotional activities and share successful strategies with other endorsers as appropriate and offer assistance for these activities as necessary, such as providing materials for mailings or speakers for conferences.

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Nonduplication**

The information to be obtained under this ICR has not been collected by EPA or any other federal agency. Other nonfederal organizations sponsor voluntary programs that promote recycling collection or buying recycled products, but do not offer a comprehensive waste reduction program that emphasizes the cost saving and climate benefits of waste reduction. OSW is continuing to work with these non-EPA programs, such as the National Recycling Coalition's (NRC's) Source Reduction Forum and the Buy Recycled Business Alliance (BRBA), to ensure that efforts are not duplicative. For example, WasteWise previously coordinated with BRBA to produce a national satellite forum on buying recycled-content products.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

On March 1, 2007 (72 FR 9326), EPA sought comments on this ICR pursuant to 5 CFR 1320.8(d). EPA received no comments.

### **3(c) Consultations**

In evaluating the new **Registration Form** and **Annual Assessment Form**, as part of the ICR renewal process, WasteWise staff conducted personal interviews with program partners to discuss the new format and requested information. Interviews were conducted with the following seven WasteWise partners:

Albert Fralinger	856 224-1638	Public Service Enterprise Group (PSEG)
Bradford Hill	212 363-3180	Evelyn Hill Inc.
John O'Donoghue	585 588-4741	Eastman Kodak Company
Tom Watson	206 296-4481	King County, WA
Don Curran	501 329-2901	Virco Mfg. Corporation
John Bernardo	208 395-4990	Albertsons, Inc.
Edward Newman	740 593-0231	Ohio University Facilities Management

Overall, these partners (“participating partners”) seemed pleased with the proposed forms. John Bernardo, from Albertsons, Inc., summed up the reaction of many participating partners: “The forms are so much more succinct, easier to fill out, and all in all an improvement to the registration and reporting processes.” He also stated, “The previous forms seemed overwhelming, and actually deterred me from joining the program (even while being marketed by WasteWise and by Seydel Companies) for over a year.” Some other comments received include:

- “The new forms will decrease our reporting time to WasteWise by about half.”
- “The new forms are almost too easy to fill out.”
- “The new forms provide less pressure from EPA on goals in specific areas and provide more options to partners to tailor their individual programs.”

Based on the feedback we received, it seems that the participating partners believed the **Registration Form** will have a positive effect on the program. Many participating partners appreciated the new section of the form which requests partners consider some of their top waste reduction priorities, making them think about activities right from the start. The participating partners thought the new **Annual Assessment Form**, which combines the old goals form and the old annual reporting form, was also an effective method to report achievements and reduce their reporting burden. The participating partners agreed that these forms are a nice change for the WasteWise program.

WasteWise continues to listen to its partners’ feedback. Many years ago, partners suggested that WasteWise provide an electronic reporting option. In response to these requests, WasteWise continues to offer online and downloadable forms, and improves these tools when necessary. (Although the electronic options reduce paper generation, they do not significantly impact respondent burden hours.) Moreover, as part of this ICR process, WasteWise received comments on the **Registration Form** and the **Annual Assessment Form**, which were taken into consideration when finalizing the forms. Based on the feedback EPA received, the Agency recalculated the burden hours for the **Registration Form** and the



**Annual Assessment Form** mainly because the original two forms (goals and reporting) were combined and the program is now asking partners for different information, such as specific waste reduction data.

**3(d) Effects of Less Frequent Collection**

The **Partner Registration Form** and **Endorser Registration Form** are one-time information submittals for organizations that wish to participate in the WasteWise program as endorsers and/or partners. Partners submit the **Annual Assessment Form** with waste reduction baseline data and goals within two months of registering. The same form is submitted again typically by March 31 of each year, this time with the partner's annual waste reduction data. Requesting this report on a less frequent basis would hinder Agency efforts to generate relevant and timely case studies and success stories that are helpful to participants. It also would hinder the ability of the Agency to review the activities by individual organizations and the program as a whole and to gain the information necessary to publicly recognize significant partner waste reduction activities.

**3(e) General Guidelines**

All of the collection activities described within this ICR fall within OMB's General Guidelines.

**3(f) Confidentiality**

No information collected by EPA under the WasteWise program comprises confidential business information.

**3(g) Sensitive Questions**

No questions of a sensitive nature are asked in any of the three forms.

**4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

**4(a) Respondents and NAICS Codes**

The WasteWise program was initially targeted to the Fortune 500 manufacturing companies and the Fortune 500 service companies. During the period covered by this ICR, however, WasteWise will continue to focus its marketing efforts on a broader audience, including medium to large size businesses, universities, and federal/state/local/tribal governments. While WasteWise actively promotes the program to a smaller subset of these groups, the program is open to all companies, trade associations, nonprofit organizations, schools, colleges, universities, and federal/state/local/tribal governments.

Due to the broad universe of eligible WasteWise partners, a relevant list of NAICS codes would include virtually every business area contained in the NAICS code manual. Therefore, it is not practical to include such a comprehensive list of affected organizations in this supporting statement.

The WasteWise Endorser Program initially targeted more than 100 trade associations across numerous industry sectors. The program is, however, open to all trade associations, membership organizations, and federal/state/local/tribal organizations in this supporting statement.

**4(b) Information Requested**

Once a prospective partner organization reviews the WasteWise materials and decides to join the program, it submits a **Partner Registration Form** (Attachment C). Within two months of registering,

new partners are asked to complete an **Annual Assessment Form** (Attachment D) to provide WasteWise with baseline waste reduction data and goals. By March 1 of each year, partners that joined the program by August 1 of the preceding year report on the progress made toward achieving their goals in the **Annual Assessment Form**.

Organizations that join the WasteWise Endorser Program need only submit the **Endorser Registration Form** (Attachment E) at the time they join.

### ***Partner Registration Form***

Program participants complete and submit to EPA a standard, one-page **Partner Registration Form** that provides basic organization information.

(i) Data items:

The reporting items include:

- How the member heard about the WasteWise Program (choose from a list of nine).
- Organization name, parent organization name (if applicable), and industry sector.
- Name, title, address, phone number, fax number, and email address of the partner's primary contact person.
- The facilities to be included in the initial waste reduction efforts (e.g., corporate headquarters only, regional facilities, all plants, etc.).
- Approximate number of employees at the joining facilities.
- Waste reduction priorities that they will focus on as part of their membership in WasteWise.
- Signature, name, and title of senior official and the date signed.

(ii) Respondent activities:

Participants conduct the following activities in order to complete and submit the **Partner Registration Form**:

- Review the WasteWise brochure, form, and other necessary materials.
- Decide which facilities will join the WasteWise Program.
- Select a primary contact person for the WasteWise Program.
- Provide feedback to WasteWise on the organization's waste reduction priorities.
- Complete the **Partner Registration Form**, including obtaining the signature of a senior official.
- Send the completed form to EPA via fax, mail, or online.

### ***Annual Assessment Form***

Program participants complete and submit to EPA a standard, two-page **Annual Assessment Form** that describes the participant's waste reduction achievements and new goals. The **Annual Assessment Forms** contain both descriptive information and quantified results. Additionally, it is important to note that this form serves two purposes by allowing:

- New partners to provide waste reduction baseline data and goals to EPA (within two months of registering to be part of the program).
- Existing partners to report on the previous year's waste reduction activities by March 1 of each year, and provide new goals to EPA.

(i) Data items:

The reporting items include:

- **Section I: Participant Information**
  - Organization name.
  - Name, phone number, and email address of the partner's primary contact person.
  - The facilities included in the report (e.g., corporate headquarters only, regional facilities, all plants, etc.) and the approximate number of employees.
- **Section II: Current Waste Reduction Activities**
  - Total amount of municipal solid waste disposed during the reporting year.
  - Dates that the report covers (one year's worth of time).

For all of the previous year's waste reduction activities, partners provide the following for both waste prevention and recycling activities:

- Listing of the product or material.
  - Description of the waste prevention/recycling activity.
  - The volume prevented/recycled.
  - Goals for the upcoming year.
- **Section III: Cost Savings/Revenue**
    - Total waste prevention revenue.
    - Total recycling revenue.
    - Total avoided purchasing costs due to waste prevention.
    - Total avoided disposal costs due to recycling and waste prevention.

- **Section IV: Buying or Manufacturing Recycled Products**
  - Listing of the product or material.
  - Current recycled content percent.
  - Previous recycled content percent.
  - Current units purchased.
  
- **Section V: Comments**
  - The partner may attach/share additional information (e.g. external promotion, employee education, program comments, etc.).
  - The partner may attach/share additional information regarding their measurement methodology and factors that may affect their ability to reliably determine the effect of the program.
  
- **Signature and title of principal contact and date.**

WasteWise assumes that this information is kept as a Common Business Practice by companies implementing internal waste reduction programs. Therefore, burden associated with recordkeeping is not included in this ICR.

(ii) Respondent activities:

Participants conduct the following activities in order to complete and submit the **Annual Assessment Form**:

- Collect and review records to assess progress during the reporting year.
- Conduct a waste assessment or account for annual waste reduction efforts.
- Review records to assess waste reduction progress.
- Set new waste reduction goals.
- Complete the Annual Assessment Form, including obtaining the signature of the principal contact.
- Send the completed form to EPA via fax, mail, or online.
- Respond to EPA questions to clarify data.

***Endorser Registration Form***

Endorsers complete and submit to EPA a standard, one-page **Endorser Registration Form** that provides basic association information and describes recruitment and promotional activities.

(i) Data items:

The reporting items include:

- Organization name.
- Name, title, address, phone number, fax number, and email address of the endorser's principal contact person.
- Approximate number of business members in the organization.
- List of primary business sectors represented by the organization (e.g., NAICS codes).
- Description of proposed recruitment campaign to encourage the organization's member organizations or constituents (e.g., local businesses) to become WasteWise partners.
- Description of proposed ongoing activities to promote WasteWise and/or provide information to organization members on waste reduction strategies (if unknown, the organization may provide this information to EPA at a later date).
- Signature, name, and title of senior official and the date signed.

(ii) Respondent activities:

Endorsers conduct the following activities in order to complete and submit the **Endorser Registration Form**:

- Review the WasteWise Endorser Program information, form, and overall WasteWise Program information.
- Determine an initial recruitment activity.
- Consider ongoing promotional activities.
- Select a primary contact person for the WasteWise Endorser Program.
- Complete the **Endorser Registration Form**, including obtaining the signature of a senior official.
- Send the completed form to EPA via fax, mail, or online.

5. **THE INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

5(a) Agency Activities

Under the WasteWise program, EPA engages in the following activities related to the three forms:

**Partner Registration Form**

- Distribute **Partner Registration Forms** to potential participants.
- Answer questions posed by potential participants regarding membership in the program.
- Receive completed forms, record/enter information into a database, and place a welcome call to the new member.

- Email new partner packets to participants.

### **Annual Assessment Form**

- Distribute **Annual Assessment Forms** to new partners for their two month response (which includes waste reduction baseline data and goals) and to existing partners for their annual reporting to WasteWise.
- Develop measurement and tracking tools to assist partners in the reporting process. WasteWise recently updated its Online Toolkit by updating many of the tools found in EPA's "Business Guide for Reducing Solid Waste" and making them available online. These tools will help organizations calculate their waste reduction baseline, track their waste reduction efforts, and much more.
- Maintain a tracking system and develop/revise standard data reports.
- Answer questions regarding the **Annual Assessment Form**.
- Receive and review the form for consistency and completeness and place any follow-up calls necessary.
  - **Reported Data Quality.** The assigned WasteWise account representative reviews the reporting form submitted by each partner for which he or she is responsible. As part of this review, representatives determine whether the reported results appear consistent with the volumes reported in previous years by the partner for similar activities. If a representative notices a report where the numbers are exactly the same, or appear to be cumulative rather than simply for the current reporting year period, the representative calls or emails, the partner to clarify the reported results. For reported amounts above 1,000,000 pounds, the representative contacts the partner to confirm the order of magnitude and to prevent any errors of interpretation. For smaller amounts, representatives look to see if the results appear consistent with the volumes reported in previous years for similar activities. In addition, reports are reviewed to ensure that only acceptable WasteWise materials and activities are included in the amounts reported. Only after this thorough review is completed does WasteWise include the data in the WasteWise program totals.
- Record/enter information into WIES and conduct quality assurance/quality control (QA/QC) on data entry.
  - **Data Entry Quality.** As a second level of quality control, a select group of individuals are assigned to review all reports after they have been entered into the WasteWise database. These individuals work with the account representatives to correct and track any entries where a large number does not appear to have been confirmed or where numerical data have been entered incorrectly or coded improperly.
  - **Waste Reduction Model (WARM) Data Entry Quality.** As a third check of the numbers, WasteWise account representatives review WARM results to ensure the information from the partner's WasteWise report has been correctly captured in this spreadsheet.
- Develop and make publicly available an annual summary of program activities and descriptions of significant accomplishments.

## **Endorser Registration Form**

- Distribute **Endorser Registration Forms** to potential endorsers.
- Answer questions posed by potential endorsers regarding membership in the program.
- Receive completed forms, record/enter information into a database, and place a welcome call to the new endorser.
- Email new endorser packets to participants.

## **5(b) Collection Methodology and Management**

In collecting and analyzing the information associated with this ICR, EPA uses a telephone system, personal computers, and database software. EPA ensures the reasonableness and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the three forms into a database. The Agency uses software to store and evaluate data obtained from **Annual Assessment Forms**. The data are used to identify prominent waste reduction strategies, to develop and publish an annual summary of program activities and case studies of significant accomplishments, and gear the program's priorities for the upcoming year.

EPA currently offers all forms in hard copy and electronically. Electronic forms do not have a significant impact on respondent or Agency burden.

The data collected under this ICR are voluntarily reported by individual WasteWise partners. The data represent partners' estimates of progress they made towards waste reduction goals (in areas such as waste prevention, recycling collection, and buying or manufacturing recycled-content products). EPA does not conduct facility audits of WasteWise partners; however, a QA/QC process is in place to review partner reports for adherence to goals. The data are published for the purpose of sharing information about WasteWise partners' programs and to encourage other organizations to explore and implement waste reduction activities. As previously mentioned, WasteWise developed a new econometric measurement tool to accurately determine the program's accomplishments for existing partners and will use the baseline data to assess progress for new partners.

## **5(c) Small Entity Flexibility**

EPA expects that some of the participants in the WasteWise Program will be small entities. EPA has designed its reporting forms to minimize respondent burden while obtaining sufficient and accurate information. The WasteWise Program was designed to be highly flexible. Organizations can choose the number of facilities to include in the program and choose their own goals based on individual organization resources. In addition, the burden associated with the WasteWise Program is inherently reduced since the initial agreement to participate is voluntary. In addition, for companies with fewer than 50 employees EPA does not conduct follow-up if **Annual Assessment Forms** are not submitted. These partners can maintain their WasteWise participation as long as they indicate that they are actively conducting waste reduction efforts.

## **5(d) Collection Schedule**

Organizations may submit **Partner Registration Forms** to join the WasteWise Program at any time. Within two months after a participant joins the program, it should submit an **Annual Assessment Form**. All existing partners' **Annual Assessment Forms** are due to EPA typically by March 31 of every year that the partner participates in the program.

Trade associations and other membership-based organizations may submit **Endorser Registration Forms** to join the WasteWise Endorser Program at any time.

# **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

## **6(a) Estimating Respondent Burden**

Exhibit 1 (see page 14) includes three tables which present the burden hours, costs per respondent, and total for all respondents during each of the three years covered under this ICR. WasteWise members are divided into three tables representing: Private, State and Federal.

The **Partner Registration Form** contains basic questions, thus the burden is expected to be minimal. The overall burden, as shown in the tables, is estimated to be one hour per participant. This burden level is an estimate based on nine years of WasteWise program experience. The burden estimate for the **Partner Registration Form** is for



reporting only.

Completing the **Annual Assessment Form** entails assessment, reporting, and recordkeeping activities. The overall annual labor burden for partners is expected to average 40 hours per participant. Burden hours for the **Annual Assessment Form** are for conducting a waste assessment to analyze waste reduction opportunities, setting up a tracking system, and mainly for reporting activities.

New partners joining WasteWise are estimated to spend 41 hours (one hour on the **Partner Registration Form** and 40 hours on the **Annual Assessment Form**) on the information collection activities in the first year of membership, and 40 hours (on the **Annual Assessment Form**) for subsequent years in the program.

The **Endorser Registration Form** asks for basic information and requests brief/general descriptions of promotional activities, thus the burden is expected to be minimal. The overall burden, as shown in Exhibit 1 tables, is estimated to be 10 hours per participant. All burden hours for the **Endorser Registration Form** are for reporting only.

The average WasteWise endorser will spend 10 hours on the information collection activities in its first year as an endorser and will incur no further information collection burden in subsequent years.

**6(b) Estimating Respondent Costs**

Currently, WasteWise has 1,650 partners and 300 endorsers. The membership breakdown by sector (i.e. private, federal, state) anticipated over the next three years is shown in the following table:

**Table 1. WasteWise Membership**

WASTEWISE PARTNERS (BY CATEGORY)				
	PRVATE	STATE	FEDERAL	TOTAL
year 1	1485	45	120	1650
year 2	1575	50	125	1750
year 3	1665	55	130	1850
WASTEWISE ENDORSERS (BY CATEGORY)				
	PRVATE	STATE	FEDERAL	TOTAL
year 1	280	10	10	300
year 2	302	11	12	325
year 3	325	12	13	350

For this supporting statement, EPA estimates an average hourly private respondent labor cost (including overhead) of \$84.00 for managerial staff, \$64.00 for technical staff, and \$36.00 for clerical staff. To arrive at these estimates, EPA consulted the May 2004 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor; this survey summarizes the unloaded factor of 2.3 for non-legal staff to derive their loaded hourly rates. No capital or operations and management costs are incurred by respondents under this ICR.

**Table 2. Private Labor Rates**

Labor Category	Rate plus overhead
Management	<b>\$84.00</b>
Technical	<b>\$64.00</b>
Administrative	<b>\$36.00</b>

EPA used consistent labor rates to estimate the cost to both federal and state respondents. Based on the General

Schedule (GS) Salary Table 2006, EPA estimates an average hourly labor rate of \$54.00 for managerial staff (GS-14, Step 3), \$39.00 for technical staff (GS-11, Step 10), and \$18.00 for clerical staff (GS-5, Step 4). EPA multiplied the basic hourly rates by the standard government overhead factor of 1.6.

**Table 3. State and Federal Labor Rates**

Labor Category	Rate plus overhead
Management	<b>\$86.40</b>
Technical	<b>\$62.40</b>
Administrative	<b>\$28.80</b>

**Exhibit 1. Annual Estimated Respondent Burden and Cost**

**1(a) Private Sector Respondents**

	Burden Hours & Individual Costs for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs		
	Hours per Respondent per Activity			Cost per Activity	Total Hours per Year	Total Cost per Year	Total Hours per Year	Total Cost per Year	Total Hours per Year	Total Cost per Year	
	Total Hours	Management	Technical								Administrative
<b>Partner Registration Form</b>											
Review Form	0.75	0.25	0.5	0	\$53.00	67.5	\$4,770.00	67.5	\$4,770.00	67.5	\$4,770.00
Complete/transmit form	0.25	0	0	0.25	\$9.00	22.5	\$810.00	22.5	\$810.00	22.5	\$810.00
<b>SUBTOTAL</b>	<b>1</b>	<b>0.25</b>	<b>0.5</b>	<b>0.25</b>	<b>\$62.00</b>	<b>90</b>	<b>\$5,580.00</b>	<b>90</b>	<b>\$5,580.00</b>	<b>90</b>	<b>\$5,580.00</b>
<b>Annual Assessment Form</b>											
Collect records and conduct a waste assessment OR account for annual efforts	20.5	2	11.5	7	\$1,156.00	30442.5	\$1,716,660.00	32287.5	\$1,820,700.00	34132.5	\$1,924,740.00
Review records to assess progress	6	2	4	0	\$424.00	8910	\$629,640.00	9450	\$667,800.00	9990	\$705,960.00
Set goals	10	1	8	1	\$632.00	14850	\$938,520.00	15750	\$995,400.00	16650	\$1,052,280.00
Complete/transmit form	2.5	0	2	0.5	\$146.00	3712.5	\$216,810.00	3937.5	\$229,950.00	4162.5	\$243,090.00
Respond to EPA Questions	1	0	1	0	\$64.00	1485	\$95,040.00	1575	\$100,800.00	1665	\$106,560.00
<b>SUBTOTAL</b>	<b>40</b>	<b>5</b>	<b>26.5</b>	<b>8.5</b>	<b>\$2,422.00</b>	<b>59400</b>	<b>\$3,596,670.00</b>	<b>63000</b>	<b>\$3,814,650.00</b>	<b>66600</b>	<b>\$4,032,630.00</b>
<b>Cost to Partners</b>											
Total Cost to All Partners						59490	\$3,602,250.00	63090	\$3,820,230.00	66690	\$4,038,210.00
New partner - submitting registration form and submitting 2-month Annual Assessment form (baseline Data)	41	5.25	27	8.75	\$2,484.00						
Partner - submitting Annual Assessment form	40	5	26.5	8.5	\$2,422.00						
<b>Endorser Registration Form</b>											
Review form	0.75	0	0.75	0	\$48.00	16.5	\$1,056.00	16.5	\$1,056.00	17.25	\$1,104.00
Determine activities	9	2	7	0	\$616.00	198	\$13,552.00	198	\$13,552.00	207	\$14,168.00
Complete/transmit	0.25	0	0	0.25	\$9.00	5.5	\$198.00	5.5	\$198.00	5.75	\$207.00
<b>Total Cost to All Endorsers</b>	<b>10</b>	<b>2</b>	<b>7.75</b>	<b>0.25</b>	<b>\$673.00</b>	<b>220</b>	<b>\$14,806.00</b>	<b>220</b>	<b>\$14,806.00</b>	<b>230</b>	<b>\$15,479.00</b>

**1(b) State Respondents**

	Burden Hours & Individual Costs for All Years					Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity				Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Total Hours	Management	Technical	Administrative		per Year	per Year	per Year	per Year	per Year	per Year
<b>Partner Registration Form</b>											
Review Form	0.75	0.25	0.5	0	\$52.80	3.75	\$254.00	3.75	\$254.00	3.75	\$264.00
Complete/transmit form	0.25	0	0	0.25	\$7.20	1.25	\$36.00	1.25	\$36.00	1.25	\$36.00
<b>SUBTOTAL</b>	<b>1</b>	<b>0.25</b>	<b>0.5</b>	<b>0.25</b>	<b>\$60.00</b>	<b>5</b>	<b>\$300.00</b>	<b>5</b>	<b>\$300.00</b>	<b>5</b>	<b>\$300.00</b>
<b>Annual Assessment Form</b>											
Collect records and conduct a waste assessment OR account for annual efforts	20.5	2	11.5	7	\$1,092.00	922.5	\$49,140.00	1025	\$54,600.00	1127.5	\$60,060.00
Review records to assess progress	6	2	4	0	\$422.40	270	\$19,008.00	300	\$21,120.00	330	\$23,232.00
Set goals	10	1	8	1	\$614.40	450	\$27,648.00	500	\$30,720.00	550	\$33,792.00
Complete/transmit form	2.5	0	2	0.5	\$139.20	112.5	\$6,264.00	125	\$6,960.00	137.5	\$7,656.00
Respond to EPA Questions	1	0	1	0	\$62.40	45	\$2,808.00	50	\$3,120.00	55	\$3,432.00
<b>SUBTOTAL</b>	<b>40</b>	<b>5</b>	<b>26.5</b>	<b>8.5</b>	<b>\$2,330.40</b>	<b>1800</b>	<b>\$104,868.00</b>	<b>2000</b>	<b>\$116,520.00</b>	<b>2200</b>	<b>\$128,172.00</b>
<b>Cost to Partners</b>											
Total Cost to All Partners						1805	\$105,168.00	2005	\$116,820.00	2205	\$128,472.00
New partner - submitting registration form and submitting 2-month Annual Assessment form (baseline Data)	41	5.25	27	8.75	\$2,390.40						
Partner - submitting Annual Assessment form	40	5	26.5	8.5	\$2,330.40						
<b>Endorser Registration Form</b>											
Review form	0.75	0	0.75	0	\$46.80	0.75	\$46.80	0.75	\$46.80	0.75	\$46.80
Determine activities	9	2	7	0	\$609.60	9	\$609.60	9	\$609.60	9	\$609.60
Complete/transmit	0.25	0	0	0.25	\$7.20	0.25	\$7.20	0.25	\$7.20	0.25	\$7.20
<b>Total Cost to All Endorsers</b>	<b>10</b>	<b>2</b>	<b>7.75</b>	<b>0.25</b>	<b>\$663.60</b>	<b>10</b>	<b>\$663.60</b>	<b>10</b>	<b>\$663.60</b>	<b>10</b>	<b>\$663.60</b>

### 1(c) Federal Respondent

	Burden Hours & Individual Costs for All Years					Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity				Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Total Hours	Management	Technical	Administrative		per Year	per Year	per Year	per Year	per Year	per Year
<b>Partner Registration Form</b>											
Review Form	0.75	0.25	0.5	0	\$52.80	3.75	\$264.00	3.75	\$264.00	3.75	\$264.00
Complete/transmit form	0.25	0	0	0.25	\$7.20	1.25	\$36.00	1.25	\$36.00	1.25	\$36.00
<b>SUBTOTAL</b>	<b>1</b>	<b>0.25</b>	<b>0.5</b>	<b>0.25</b>	<b>\$60.00</b>	<b>5</b>	<b>\$300.00</b>	<b>5</b>	<b>\$300.00</b>	<b>5</b>	<b>\$300.00</b>
<b>Annual Assessment Form</b>											
Collect records and conduct a waste assessment OR account for annual efforts	20.5	2	11.5	7	\$1,092.00	2460	\$131,040.00	2562.5	\$136,500.00	2665	\$141,960.00
Review records to assess progress	6	2	4	0	\$422.40	720	\$50,688.00	750	\$52,800.00	780	\$54,912.00
Set goals	10	1	8	1	\$614.40	1200	\$73,728.00	1250	\$76,800.00	1300	\$79,872.00
Complete/transmit form	2.5	0	2	0.5	\$139.20	300	\$16,704.00	312.5	\$17,400.00	325	\$18,096.00
Respond to EPA Questions	1	0	1	0	\$62.40	120	\$7,488.00	125	\$7,800.00	130	\$8,112.00
<b>SUBTOTAL</b>	<b>40</b>	<b>5</b>	<b>26.5</b>	<b>8.5</b>	<b>\$2,330.40</b>	<b>4800</b>	<b>\$279,648.00</b>	<b>5000</b>	<b>\$291,300.00</b>	<b>5200</b>	<b>\$302,952.00</b>
<b>Cost to Partners</b>											
<b>Total Cost to All Partners</b>						<b>4805</b>	<b>\$279,948.00</b>	<b>5005</b>	<b>\$291,600.00</b>	<b>5205</b>	<b>\$303,252.00</b>
New partner - submitting registration form and submitting 2-month Annual Assessment form (baseline Data)	41	5.25	27	8.75	\$2,390.40						
Partner - submitting Annual Assessment form	40	5	26.5	8.5	\$2,330.40						
<b>Endorser Registration Form</b>											
Review form	0.75	0	0.75	0	\$46.80	1.5	\$93.60	1.5	\$93.60	0.75	\$46.80
Determine activities	9	2	7	0	\$609.60	18	\$1,219.20	18	\$1,219.20	9	\$609.60
Complete/transmit	0.25	0	0	0.25	\$7.20	0.5	\$14.40	0.5	\$14.40	0.25	\$7.20
<b>Total Cost to All Endorsers</b>	<b>10</b>	<b>2</b>	<b>7.75</b>	<b>0.25</b>	<b>\$663.60</b>	<b>20</b>	<b>\$1,327.20</b>	<b>20</b>	<b>\$1,327.20</b>	<b>10</b>	<b>\$663.60</b>

**6(c) Estimating Agency Burden and Costs**

Exhibit 2 (see page 19) presents the estimated Agency burden hours and costs associated with the information collection activities under this ICR. Other direct costs (copying, printing, telephone, and mailing expenses) are also included. EPA based its burden estimates on nine years of experience managing the WasteWise program and interacting with partners.

The Agency expects most activities under this ICR to be performed by managerial staff (25 percent) and technical staff (75 percent). When clerical staff is utilized, clerical activities will constitute one percent of the work (with technical staff at 74 percent).

EPA used the Federal labor rates from above to calculate EPA labor costs. Based on the General Schedule (GS) Salary Table 2006, EPA estimates an average hourly labor rate of \$54.00 for managerial staff (GS-14, Step 3), \$39.00 for technical staff (GS-11, Step 10), and \$18.00 for clerical staff (GS-5, Step 4). EPA multiplied the basic hourly rates by the standard government overhead factor of 1.6.

EPA still expects to have contractor support for various activities associated with the information collection under this ICR and has included contractor costs in the estimates. Contractor hourly rates, estimated based on the rates for the current contractor, ICF, are \$103.66 for managerial staff and \$72.54 for technical staff so the average hourly rates are proportional to the percentage of contractor support on a given task.

**Table 4. Agency Labor Rates**

Agency Labor Costs*							
EPA/CONT Share	Managm	Tech	Admin	Managmt % perf	Technical % perf	Admin % perf	Avg hrly rate**
100% EPA	\$86.40	\$62.40	\$28.80	25%	74%	1%	\$68.06
0% CONT	\$0.00	\$0.00	\$0.00	0%	0%	0%	\$0.00
<b>TOTAL</b>	<b>\$86.40</b>	<b>\$62.40</b>	<b>\$28.80</b>				<b>\$68.06</b>
25% EPA	\$21.60	\$15.60		25%	75%	0%	\$17.10
75% CONT	\$77.75	\$54.41		25%	75%	0%	\$60.24
<b>TOTAL</b>	<b>\$99.35</b>	<b>\$70.01</b>					<b>\$77.34</b>
0% EPA	\$0.00	\$0.00		25%	75%	0%	\$0.00
100% CONT	\$103.66	\$72.54		25%	75%	0%	\$80.32
<b>TOTAL</b>	<b>\$103.66</b>	<b>\$72.54</b>					<b>\$80.32</b>

\* EPA = hourly rate plus 60 percent overhead  
 Contractor = hourly rate includes overhead  
 \*\* Based on shared activities/costs by EPA and contractor

## Exhibit 2. Annual Estimated Agency Burden and Cost

	Average Hourly Rate	YEAR 1				YEAR 2				YEAR 3			
		Labor		Other Direct	Total Costs	Labor		Other Direct	Total Costs	Labor		Other Direct	Total Costs
		Hours	Costs	Costs		Hours	Costs	Costs		Hours	Costs	Costs	
<b>PARTNER REGISTRATION FORM</b>													
Distribute Forms	\$77.34	250	\$19,335.00	\$1,000.00	\$20,335.00	250	\$19,335.00	\$1,000.00	\$20,335.00	250	\$19,335.00	\$1,000.00	\$20,335.00
Answer Questions	\$80.32	500	\$40,160.00	\$2,000.00	\$42,160.00	500	\$40,160.00	\$2,000.00	\$42,160.00	500	\$40,160.00	\$2,000.00	\$42,160.00
Record/Enter Forms	\$80.32	75	\$6,024.00	\$300.00	\$6,324.00	75	\$6,024.00	\$300.00	\$6,324.00	75	\$6,024.00	\$300.00	\$6,324.00
Mail Out Member Packets	\$80.32	113	\$9,076.16	\$450.00	\$9,526.16	113	\$9,076.16	\$450.00	\$9,526.16	113	\$9,076.16	\$450.00	\$9,526.16
<b>SUBTOTAL</b>		<b>938</b>	<b>\$74,595.16</b>	<b>\$3,750.00</b>	<b>\$78,345.16</b>	<b>938</b>	<b>\$74,595.16</b>	<b>\$3,750.00</b>	<b>\$78,345.16</b>	<b>938</b>	<b>\$74,595.16</b>	<b>\$3,750.00</b>	<b>\$78,345.16</b>
<b>ANNUAL ASSESSMENT FORM</b>													
Distribute Forms	\$77.34	240	\$18,561.60	\$960.00	\$19,521.60	278	\$21,500.52	\$1,110.00	\$22,610.52	315	\$24,362.10	\$1,260.00	\$25,622.10
Develop/Maintain Tracking System	\$80.32	250	\$20,080.00	\$0.00	\$20,080.00	250	\$20,080.00	\$0.00	\$20,080.00	250	\$20,080.00	\$0.00	\$20,080.00
Answer Questions/Review/Followup	\$77.34	2,000	\$154,680.00	\$7,680.00	\$162,360.00	2,100	\$162,414.00	\$8,880.00	\$171,294.00	2,200	\$170,148.00	\$10,080.00	\$180,228.00
Record/Code Enter Forms	\$80.32	1,500	\$120,480.00	\$0.00	\$120,480.00	1,600	\$128,512.00	\$0.00	\$128,512.00	1,700	\$136,544.00	\$0.00	\$136,544.00
QA/QC Data	\$80.32	1,500	\$120,480.00	\$0.00	\$120,480.00	1,600	\$128,512.00	\$0.00	\$128,512.00	1,700	\$136,544.00	\$0.00	\$136,544.00
Develop/Publish Annual Summary	\$77.34	800	\$61,872.00	\$1,200.00	\$63,072.00	800	\$61,872.00	\$1,200.00	\$63,072.00	800	\$61,872.00	\$1,200.00	\$63,072.00
<b>SUBTOTAL</b>		<b>6,290</b>	<b>\$496,153.60</b>	<b>\$9,840.00</b>	<b>\$505,993.60</b>	<b>6,628</b>	<b>\$522,890.52</b>	<b>\$11,190.00</b>	<b>\$534,080.52</b>	<b>6,965</b>	<b>\$549,550.10</b>	<b>\$12,540.00</b>	<b>\$562,090.10</b>
<b>ENDORSEER REGISTRATION FORM</b>													
Distribute Forms	\$77.34	5	\$386.70	\$20.00	\$406.70	5	\$386.70	\$20.00	\$406.70	5	\$386.70	\$20.00	\$406.70
Answer Questions	\$77.34	10	\$773.40	\$40.00	\$813.40	10	\$773.40	\$40.00	\$813.40	10	\$773.40	\$40.00	\$813.40
Record/Enter Forms	\$80.32	10	\$803.20	\$20.00	\$823.20	10	\$803.20	\$20.00	\$823.20	10	\$803.20	\$20.00	\$823.20
Mail Endorser Packet	\$80.32	5	\$401.60	\$180.00	\$581.60	5	\$401.60	\$180.00	\$581.60	5	\$401.60	\$180.00	\$581.60
<b>SUBTOTAL</b>		<b>30</b>	<b>\$2,364.90</b>	<b>\$260.00</b>	<b>\$2,624.90</b>	<b>30</b>	<b>\$2,364.90</b>	<b>\$260.00</b>	<b>\$2,624.90</b>	<b>30</b>	<b>\$2,364.90</b>	<b>\$260.00</b>	<b>\$2,624.90</b>
<b>COST TO EPA</b>													
Total Cost		7,258	\$573,113.66	\$13,850.00	\$586,963.66	7,596	\$599,850.58	\$15,200.00	\$615,050.58	7,933	\$626,510.16	\$16,550.00	\$643,060.16



**6(d) Estimating the Respondent Universe and Total Burden and Costs**

The WasteWise Program currently has approximately 1,650 partners. EPA expects 100 additional partners to join the program during each year for the period covered by this ICR. The **Partner Registration Form** is a one-time reporting requirement; therefore only the new partners for each year (100 partners estimated for each year covered by this ICR) submit them. New partners and existing partners need to submit the **Annual Assessment Form**, an annual reporting requirement containing quantitative information (1,650 submittals in year 1, 1,750 in year 2, and 1,850 in year 3). The WasteWise program currently has approximately 300 endorsers. The **Endorser Registration Form** is a one-time reporting event; therefore only new endorsers for each year (25 endorsers estimated for each year covered by this ICR) submit them.

**6(e) Bottom Line Burden Hours and Costs Tables**

The bottom line burden and costs to respondents are displayed in the table below. Note that the estimated number of respondents changes each year, depending on the information collection activity. There are variations in the bottom line costs for each of the three years covered because the number of respondents increases each of these years.

**Table 5. Bottom Line Burden and Costs to Respondents**

FORM	NUMBER OF RESPONDENTS	BURDEN HOURS	COST (in dollars)
<b>YEAR 1</b>			
Partner Registration	100	100	\$6,180.00
Annual Assessment or Baseline Data Submission	1,650	66,000	\$3,981,186.00
Endorser Registration	25	250	\$16,796.80
<b>Year 1 Bottom Line</b>	<b>1,775</b>	<b>66,350</b>	<b>\$4,004,162.80</b>
<b>YEAR 2</b>			
Partner Registration	100	100	\$6,180.00
Annual Assessment or Baseline Data Submission	1,750	70,000	\$4,222,470.00
Endorser Registration	25	250	\$16,796.80
<b>Year 2 Bottom Line</b>	<b>1,875</b>	<b>70,350</b>	<b>\$4,245,446.80</b>
<b>YEAR 3</b>			
Partner Registration	100	100	\$6,180.00
Annual Assessment or Baseline Data Submission	1,850	74,000	\$4,463,754.00
Endorser Registration	25	250	\$16,806.20
<b>Year 3 Bottom Line</b>	<b>1,975</b>	<b>74,350</b>	<b>\$4,486,740.20</b>
<b>3-YEAR TOTAL</b>	<b>5,625</b>	<b>211,050</b>	<b>\$12,736,349.80</b>

\* Bottom line data for number of respondents is the sum of those partners submitting an annual assessment form/baseline data and endorser registration form. Those submitting a partner registration form are already counted within the first subset.



The bottom line burden and costs to EPA also vary each year, according to the number of respondents. Table 2 indicated the Agency's bottom line burden and costs for each of the three years covered under this ICR.

**Table 6. Bottom Line Burden and Costs to EPA**

YEAR	BURDEN HOURS	COST
Year 1	7,258	\$586,963.66
Year 2	7,596	\$615,050.58
Year 3	7,933	\$643,060.16
<b>3-YEAR TOTAL</b>	<b>22,787</b>	<b>\$1,845,074.40</b>

**6(f) Reasons for Change in Burden**

Since the last clearance, EPA has made the following changes to the WasteWise Program that affect information collection activities:

Adjustments

- **Changes in Wage Rates.** EPA changed the burden costs for private respondents to reflect the updated rates in the May 2004 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor. EPA also changed the burden costs to state and federal respondents, as well as, the Agency to reflect current GS rates. This only impacted burden costs; it did not impact burden hours.
- **Variation in Number of Participants.** For this ICR, the Agency updated the partner numbers to reflect current WasteWise membership. EPA expects that 100 new partners will join during each year covered by this ICR. Additionally, it expects the WasteWise Endorser Program to bring in 25 new endorsers each year.

**6(g) Burden Statement**

The reporting burden for information collection requirements associated with completing the **Partner Registration Form** is estimated to be one hour per respondent. The burden estimate includes time to review WasteWise program information and requirements and to complete and submit the form.

The reporting burden for information collection requirements associated with completing the **Annual Assessment Form** is estimated to be 40 hours per respondent. This burden estimate includes time to conduct a waste assessment, set up a tracking system, determine goals, collect and review records, complete and submit the form, and respond to questions from EPA regarding data clarification.

The reporting burden for information collection requirements associated with completing the **Endorser Registration Form** is estimated to be 10 hours per respondent. This burden estimate includes time to review WasteWise Endorser Program information and requirements, to determine recruitment and promotional activities, and to complete and submit the form.

Burden means the total time, effort, and financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information

unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-RCRA-2007-0022, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202)566-1744, and the telephone number for RCRA Docket is (202)566-0270.

Use [www.regulations.gov](http://www.regulations.gov) to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified in this document.

## **Attachment A**

### **Statistical Methods for Estimating Program Benefits for WasteWise**

EPA previously proposed a statistical method for estimating the waste prevention and recycling benefits attributable to the WasteWise Program. A panel of academic experts convened by EPA to perform a peer review found the previously proposed statistical methodology unsatisfactory, primarily because of the difficulties that exist in consistently estimating program benefits without either baseline waste reduction/recycling data for Partners (prior to joining WasteWise) or waste reduction/recycling data from non-Partners (which would also estimate the baseline). Similarly, the Office of Management and Budget (OMB) has expressed skepticism regarding the program's accomplishments because of perceived weaknesses in the program's impact assessment methodology. OMB has suggested the need to collect data from non-Partners for use in developing a statistical method for estimating the influence and attribution of the WasteWise Program on partner behavior.

In the discussions below, we briefly describe statistical approaches that use baseline and non-baseline waste data to estimate the program benefits. Since 2004, EPA has required baseline data for all new partners. In total, we estimate that we have baseline data for approximately 5-10% of all WasteWise partners.

The following approaches assume that baseline data are available and can be obtained, either from Partners only, from non-Partners only, or from both Partners and non-Partners. As explained below, the ideal option is to have baseline data from Partners and non-Partners, since that way we will be able to adjust both for the effects of general trends in waste reduction / recycling applicable to all entities and for the possibility that the waste reduction / recycling by Partners and non-Partners might not be related to the explanatory variables in exactly the same way. In addition, to measure waste reduction and recycling, two types of explanatory variables will need to be collected. From all Partners and non-Partners in the database, we will need to define and collect explanatory variables related to the decision to join the WasteWise program. From the reporting Partners and non-Partners, we will need to define and collect explanatory variables related to the amount of waste reduction/recycling. For example, if the analysis is restricted to estimating the program benefits for the S&P 500 companies, then the publicly available explanatory variables defined in the previously proposed statistical methodology could be used as a good starting point. A broader analysis might use all publicly traded companies as the universe of interest, and the explanatory variables would be obtained from public information for those companies.

#### **Assess Program Benefits**

This summary describes some statistical methods for estimating the program benefits. Assume first that the decision whether or not to report waste data is unrelated to the amount of waste generated. (We will deal with this issue later.) There are several possible approaches, depending upon the type of data available. In the approaches below, let  $D$  be the program indicator, which equals 1 for Partners and 0 for non-Partners.

1. **Baseline data for Partners and non-Partners.** Assumes that we obtain baseline (before joining WasteWise) and non-baseline waste data for Partners and have (baseline) waste data for non-Partners. If the decision to join the program were totally random (which is not the case), then the program effect could easily be estimated by regressing the waste reduction/recycling against  $D$ , the calendar year, and other explanatory variables. The program effect is the estimated coefficient for  $D$  from this regression, which we refer to as the waste regression. Since it is possible that certain types of companies are more likely to join the program, an adjustment for self-selection may be needed to avoid substantial bias. A probit model can adjust for the self-selection. We can assume that there is some unknown latent variable  $D^*$  that is normally distributed so that if  $D^* > 0$  the company will join the program and if  $D^* \leq 0$  the company will not join the program. There is a regression equation relating  $D^*$  to several explanatory variables. To consistently estimate the

program effect, you can either modify the waste regression to include an extra Mill's ratio term or you can replace D by the estimated probability of joining WasteWise from the probit model. The former method is preferable because it can allow for the possibility that the waste regression equation is different for Partners and non-Partners. For example, if earnings are one of the explanatory variables, then it is possible that increasing earnings by \$1 million increases the recycling by a larger amount for Partners compared to non-Partners. This is called the switching regression model.

For this approach, we need data from some Partners both before and after joining the program, and we also need data from non-Partners. Data from Partners that do not provide baseline data can and should be included in the analyses; although those data are not directly used to estimate the program effect coefficient, they provide information on the effects of calendar year and other explanatory variables on waste reduction and recycling and thus improve the coefficient estimates from the regression equation.

2. No baseline data for Partners. Assumes we obtain data from Partners and non-Partners, but no baseline data from the Partners. In this case we can use the same approach as above, but without the calendar year effect. The calendar year effect cannot be estimated because it cannot be distinguished from the program effect. Therefore, we would have to assume that there are no general external time trends affecting waste reduction/recycling for all companies. We can still allow for the possibility that the waste regression equation is different for Partners and non-Partners by using the switching regression model.

3. Partner data only. Assumes we obtain Partner data, including some Partners with baseline data. In this case, we can use the same approach as above, but without the calendar year effect. The calendar year effect cannot be estimated because it cannot be distinguished from the program effect. Therefore, we would have to assume that there are no general external time trends affecting waste reduction/recycling for all companies. Furthermore, since we have no non-Partner data, we have to assume that the waste regression equation is exactly the same for Partners and non-Partners.

The above analyses show that the program effect can be estimated as long as you either have baseline data from Partners or non-Partners. If you have Partner and non-Partner baseline data, then fewer assumptions need to be made. If you are missing either the Partner or non-Partner baseline data, then we need to make assumptions that cannot be verified and may not be true.

## **Adjustments for Non-Reporting**

The WasteWise waste reduction and recycling data are missing for many of the Partners. The reasons for why some companies fail to report are not known with precision: the reasons may include lack of data, unwillingness to share information, lack of time/resources to complete the reporting process, etc. Since it is possible non-reporting is related to the volume of waste generated, some sort of adjustment to eliminate these effects may be necessary. The appropriate adjustment will depend upon the reasons why a company does not report as well as the data availability.

1. Random reporting decision unrelated to waste generation. Best case. The simplest case is when the decision not to report is always unrelated to the amount of waste reduction or recycling. For example, if the burden of calculating waste reductions and reporting them is too large, then companies may not report even if their waste reduction was significant. In this case the above approach can be applied using only the data from the reporting Partners and non-Partners. This approach assumes that the non-reporting Partners generate the same waste distribution as the reporting Partners, which therefore leads to the best case (highest) estimate of the total program benefit.

2. Non-reporters have zero waste reduction / recycling. Worst case. This case assumes that a

company will not report if its waste reduction/recycling is zero or negative. A Tobit censored regression model is appropriate for this case. The waste regression equation gives the latent waste reduction or recycling. If the latent waste is positive, then the company reports the actual waste reduction. If the latent waste is negative, then the company does not report but we assume their waste was zero. A maximum likelihood method is used to estimate the regression coefficients, using the same adjustments for self-selection. (Since the Tobit method is known to be biased when the residual variances are not constant, a more accurate approach would use maximum likelihood to simultaneously fit both the Tobit waste equation and the self-selection equation.) Using this model, the non-reporters are “free-loaders” since they are in the WasteWise program but are not using the program to reduce their waste levels. This assumption leads to the worst case (lowest) estimate of the total program benefit.

3. The non-reporting decision depends on certain company explanatory variables. In principle, the decision not to report might depend upon one or more explanatory variables, possibly including the amount of waste. An additional probit regression equation is needed to estimate the probability of reporting as a function of these explanatory variables. This analysis might require additional explanatory variables to be collected from the reporting and non-reporting Partners. The hardest part of such an approach may be to decide which variables would be likely to impact the reporting decision and could be made available.

One of the peer reviewers of the previously proposed statistical method suggested that the first two options for dealing with non-reporting could be used to provide an uncertainty range for the program benefit.

## **Summary**

In this narrative, we have outlined some statistical approaches to estimating the program benefits of WasteWise, assuming that baseline waste data are obtained. The analysis with the fewest assumptions uses baseline data from Partners and non-Partners. The estimated program benefit can be simply adjusted for the non-reporting Partners by assuming the best case that the reporting decision is random. A worst case assumes that non-reporters have no waste reduction or recycling, which can be treated using a Tobit method. Properly applying these more robust methods is likely to require more resources than have been used in the past, since substantial additional data will need to be collected and the statistical analysis will need to be completely developed, coded, and applied. A crucial initial step will be to screen the data for unusual outlier values or unexpected correlation patterns to ensure that the available data are sufficiently robust for these analyses.